

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

TERESA GIPSON,	:	Case No. 2:21-cv-2440
Plaintiff,	:	Judge
v.	:	
LVNV FUNDING, LLC,	:	
Defendant.	:	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant hereby removes the above-captioned action from the General Sessions Court of Shelby County, Tennessee to the United States District Court, Western District of Tennessee, Memphis Division on the following grounds:

1. Plaintiff filed this action against the Defendant in General Sessions Court of Shelby County, Tennessee, Civil Case No. 2089434, on May 13, 2021. A copy of the Warrant and Complaint is attached.
2. The complaint alleges a violation of the federal Fair Debt Collection Practices Act, codified at 15 U.S.C. 1692 et seq. and violations of state law.
3. On June 1, 2021, a copy of the Warrant and Complaint was served on Defendant. Therefore, this removal is timely pursuant to 28 U.S.C. § 1446(b), having been made and filed within thirty days of receipt by the Defendant of a copy of the initial pleading setting forth the claim for relief upon which jurisdiction is based.

4. Copies of all process, pleadings and orders served upon Defendant are attached and filed with this Notice as Exhibit 1, pursuant to 28 U.S. C. § 1446(a). To the best of the undersigned's knowledge, no other pleadings or documents, other than the documents attached hereto, have been filed in this matter.

Respectfully Submitted,

/s/Alan Pritchard
Alan Pritchard (14450)
5384 Poplar Ave Ste 333
Memphis, TN 38119-3656
Tel. (901) 249-8748
contact@alanpritchardlaw.com

CERTIFICATE OF SERVICE

I certify that the foregoing was served via U.S. Mail on July 1, 2021, by placing it in the mail addressed to Plaintiff's counsel as follows:

Kevin A. Snider
Snider & Horner, PLLC
Corporate Gardens, 9056 Stone Walk Place
Germantown, TN 38138

/s/Alan Pritchard
Alan Pritchard (14450)